COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Proceeding by the Department of Telecommunications and Energy on its own Motion to Implement the Requirements of the Federal Communications Commission's Triennial Review Order Regarding Switching for Mass Market Customers	D.T.E. 03-60 – Track B

AT&T's FOURTH SET OF INFORMATION REQUESTS TO VERIZON-MASSACHUSETTS

AT&T Communications of New England, Inc. ("AT&T") hereby submits to Verizon-

Massachusetts ("Verizon") the following information requests. AT&T requests responses in

accordance with the Procedural Order Memorandum and Ground Rules issued by the

Department in this docket on October 17, 2003 and November 24, 2003.

INSTRUCTIONS

1. Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.

2. These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.

3. If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.

4. If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.

5. If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.

6. Unless otherwise stated, information requests refer to the state of Massachusetts.

ATT-VZ-170 Please fully explain the bases, and provide support, for the following assumptions in Verizon's Wholesale Non-Recurring Cost Model:

(a)   The "Connect Typical Occurrence" factor on initial hot cut orders **for querying CLECs about "non flow through orders"** as reported in NMC activity # 2, column D in, respectively:

      (i)   Tab 1
      (ii)   Tab 3
      (iii)   Tab 5
      (iv)   Tab 7.

(b)   The "Connect Typical Occurrence" factor on initial hot cut orders **for creating manual orders, "if necessary,"** as reported in see NMC activity # 4, column D in, respectively:

      (i)   Tab 1
      (ii)   Tab 3
      (iii)   Tab 5
      (iv)   Tab 7.

(c)   The assumption that the "Connect Typical Occurrence" factor on initial hot cut orders for both (1) querying CLECs about "non flow through orders" and (2) creating manual orders, "if necessary," are the same on each of Tabs 1, 3, 5, and 7, respectively. In your response, please explain whether this is a coincidence or whether it is a result of Verizon's process. That is, please explain whether or not the initial hot cut orders about which Verizon issues a "non flow through order" query are the same as the orders for which Verizon creates manual orders. If they are the same, please explain why.

(d)   The "Disconnect Typical Occurrence" factor on initial hot cut orders **for querying CLECs about "non flow through orders"** as reported in NMC activity # 2, column H in, respectively:

      (i)   Tab 1
      (ii)   Tab 3
      (iii)   Tab 5
      (iv)   Tab 7.

(e)   The "Disconnect Typical Occurrence" factor on initial hot cut orders **for creating manual orders, "if necessary,"** as reported in NMC activity # 4, column H in, respectively:

      (i)   Tab 1
      (ii)   Tab 3
      (iii)   Tab 5
      (iv)   Tab 7.

(f)   The assumption that the "Disconnect Typical Occurrence" factor on initial hot cut orders for both (1) querying CLECs about "non flow through orders" and (2) creating manual orders, "if necessary," are the same on each of Tabs 1, 3, 5, and

7, respectively. In your response, please explain whether this is a coincidence or whether it is a result of Verizon's process. That is, please explain whether or not the initial hot cut orders about which Verizon issues a "non flow through order" query are the same as the orders for which Verizon creates manual orders. If they are the same, please explain why.

ATT-VZ-171 If not included in your response to ATT-VZ-170, above, please provide all data, analyses, workpapers, and/or reports upon which Verizon relied in arriving at the factors about which ATT-VZ-170 inquires, and provide an explanation of how Verizon used such information to calculate this Typical Occurrence factor. Please provide all data and calculations in an electronic form in which the data can be manipulated (e.g., Excel spreadsheet).

ATT-VZ-172 Regarding the assumed percentage in Verizon's Wholesale Non-Recurring Cost Model of initial hot cut orders that do not flow through, as reported in NMC activities # 2 and # 4, column D for each of Tabs 1, 3, 5, and 7, please provide the following information:

(a) Please reconcile the discrepancies between this percentage and the performance rates reported in metrics OR-5-01 and OR-5-03 of Verizon's CLEC Aggregate C2C Reports for Massachusetts for 2003. Please explain why Verizon's assumed non-flow through factor is significantly higher than the non-flow through factor indicated in Verizon's Aggregate C2C Reports for 2003 (e.g., Verizon reports, in metrics OR-5-01 and OR-5-03 of its November, 2003 C2C Report, flow through rates of 95.07 % an 98.82 %, respectively.)

(b) Please provide a list of the reasons causing orders not to flow through as reported in **NMC activity # 2, column D**, in Tabs 1, 3, 5, and 7, respectively, and for each such reason provide the percentage of non-flow through attributable to such reason in Tabs, 1, 3, 5, and 7, respectively, based on the data Verizon used to estimate the Typical Occurrence factor reported in NMC activity #2, column D. Provide all supporting data and calculations in electronic form in a manner that permits AT&T to manipulate the data.

(c) Please provide a list of the reasons causing orders not to flow through as reported in **NMC activity # 4, column D,** in Tabs 1, 3, 5, and 7, respectively, and for each such reason provide the percentage of non-flow through attributable to such reason in Tabs, 1, 3, 5, and 7, respectively, based on the data Verizon used to estimate the Typical Occurrence factor reported in NMC activity #4, column D. Provide all supporting data and calculations in electronic form in a manner that permits AT&T to manipulate the data.

(d) Please provide, pursuant to the Protective Order in this case, the Typical Occurrence factor for *each CLEC* as found in the data used to estimate the assumed Typical Occurrence factor **for querying CLECs about "non flow through orders"** as reported in NMC activity # 2, column D in, respectively, Tabs, 1, 3, 5, and 7. Alternatively, Verizon may include the name of the CLEC in the data provided in response to ATT-VZ-171 in a manner that permits AT&T to calculate CLEC specific Typical Occurrence factors. If, contrary to AT&T's position, Verizon believes that the name of the CLECs may not be provided even pursuant to the Protective Order, then please identify each CLEC by a letter and provide the requested information, leaving for a later time the proprietary issues.

(e)   Please provide, pursuant to the Protective Order in this case, the Typical Occurrence factor for *each CLEC* as found in the data used to estimate the assumed Typical Occurrence factor **for creating manual orders, "if necessary,"** as reported in see NMC activity # 4, column D in, respectively:, respectively, Tabs, 1, 3, 5, and 7. Alternatively, Verizon may include the name of the CLEC in the data provided in response to ATT-VZ-171 in a manner that permits AT&T to calculate CLEC specific Typical Occurrence factors. If, contrary to AT&T's position, Verizon believes that the name of the CLECs may not be provided even pursuant to the Protective Order, then please identify each CLEC by a letter and provide the requested information, leaving for a later time the proprietary issues.

ATT-VZ-173 Please fully explain the bases, and provide support, for the following assumptions in Verizon's Wholesale Non-Recurring Cost Model:

(a)   The assumed percentage of initial hot cut orders whose **due dates are canceled or modified** as reported in NMC Activity # 6, column D in, respectively:

   (i)   Tab 1
   (ii)   Tab 3
   (iii)   Tab 5
   (iv)   Tab 7.

(b)   The assumed percentages of initial hot cut orders for **which assignment problems are referred "to CLEC, APC, NMC"** as reported in NMC Activity # 5, Column D in, respectively:

   (i)   Tab 1
   (ii)   Tab 3
   (iii)   Tab 5
   (iv)   Tab 7.

(c)   The assumed percentages of initial hot cut orders for which **throwbacks are performed** as reported in NMC Activity # 7, Column D in, respectively:

   (i)   Tab 1
   (ii)   Tab 3
   (iii)   Tab 5
   (iv)   Tab 7.

ATT-VZ-174 If not included in your response to ATT-VZ-173, above, please provide all data, analyses, workpapers, and/or reports upon which Verizon relied in arriving at the assumptions about which information request ATT-VZ-173 inquires, and provide an explanation of how Verizon used such information in order to calculate these percentages. Please provide all data and calculations in an electronic form in which the data can be manipulated (e.g., Excel spreadsheet).

ATT-VZ-175 Please fully explain the bases, and provide support, for the following assumptions in Verizon's Wholesale Non-Recurring Cost Model:

(a)   The "Connect Time" (in minutes) for **querying CLECs about "non flow through orders"** as listed in NMC activity # 2, Column C in, respectively:

    (i) Tab 1

    (ii) Tab 3

    (iii) Tab 5

    (iv) Tab 7.

(b) The "Disconnect Time" (in minutes) **for querying CLECs about "non flow through orders"** as listed in NMC activity # 2, Column G in, respectively:

    (i) Tab 1

    (ii) Tab 3

    (iii) Tab 5

    (iv) Tab 7.

(c) The "Connect Time" (in minutes) **for creating manual orders, "if necessary,"** as listed in NMC activity # 4, Column C in, respectively:

    (i) Tab 1

    (ii) Tab 3

    (iii) Tab 5

    (iv) Tab 7.

(d) The "Disconnect Time" (in minutes) **for creating manual orders, "if necessary,"** as listed in NMC activity # 4, Column G in, respectively:

    (i) Tab 1

    (ii) Tab 3

    (iii) Tab 5

    (iv) Tab 7.

(e) The "Connect Time" (in minutes) **for canceling or modifying due dates on orders**, as listed in NMC activity # 6, Column C in, respectively:

    (i) Tab 1

    (ii) Tab 3

    (iii) Tab 5

    (iv) Tab 7.

(f) The "Disconnect Time" (in minutes) **for canceling or modifying due dates on orders**, as listed in NMC activity # 6, Column G in, respectively:

    (i) Tab 1

    (ii) Tab 3

    (iii) Tab 5

    (iv) Tab 7.

(g) The "Connect Time" (in minutes) **for performing throwbacks**, as listed in NMC activity # 7, Column C in, respectively:

    (i) Tab 1

    (ii) Tab 3

    (iii) Tab 5

    (iv) Tab 7.

ATT-VZ-176 If not included in your response to ATT-VZ-175, above, please provide all data, analyses, workpapers, and/or reports upon which Verizon relied in arriving at the assumptions

about which information request ATT-VZ-175 inquires, and provide an explanation of how Verizon used the information in these reports in order to calculate these percentages. Please provide all data and calculations in an electronic form in which the data can be manipulated (e.g., Excel spreadsheet).

ATT-VZ-177 Please fully explain the bases, and provide support, for the following assumptions in Verizon's Wholesale Non-Recurring Cost Model:

(a) The "Connect Time" (in minutes) for analyzing throwbacks as listed in RCCC activity # 10, Column C in, respectively:

      (i)   Tab 1
      (ii)   Tab 3
      (iii)   Tab 5
      (iv)   Tab 7.

(b) The "Connect Typical Occurrence" factor for analyzing throwbacks as listed in RCCC activity # 10, Column D in, respectively:

      (i)   Tab 1
      (ii)   Tab 3
      (iii)   Tab 5
      (iv)   Tab 7.

(c) The "Connect Time" (in minutes) for coordinating throwbacks as listed in RCCC activity # 11, Column C in, respectively:

      (i)   Tab 1
      (ii)   Tab 3
      (iii)   Tab 5
      (iv)   Tab 7.

(d) The "Connect Typical Occurrence" factor for coordinating throwbacks as listed in RCCC activity # 11, Column D in, respectively:

      (i)   Tab 1
      (ii)   Tab 3
      (iii)   Tab 5
      (iv)   Tab 7.

(e) The "Connect Time" (in minutes) for completing throwbacks as listed in RCCC activity # 12, Column C in, respectively:

      (i)   Tab 1
      (ii)   Tab 3
      (iii)   Tab 5
      (iv)   Tab 7.

(f) The "Connect Typical Occurrence" factor for completing throwbacks as listed in RCCC activity # 12, Column D in, respectively:

      (i)   Tab 1
      (ii)   Tab 3
      (iii)   Tab 5

           (iv)   Tab 7.

(g)   The "Connect Time" (in minutes) for assigning outside plant and central office facilities for non-flow-through service orders, answering calls for assistance from Field Technicians, and responding to queries from NMC, as listed in APC activity # 1, Column C in, respectively:

           (i)   Tab 1
           (ii)   Tab 3
           (iii)   Tab 5
           (iv)   Tab 7.

(h)   The "Connect Typical Occurrence" factor for assigning outside plant and central office facilities for non-flow-through service orders, answering calls for assistance from Field Technicians, and responding to queries from NMC, as listed in APC activity # 1, Column D in, respectively:

           (i)   Tab 1
           (ii)   Tab 3
           (iii)   Tab 5
           (iv)   Tab 7.

ATT-VZ-178 If not included in your response to ATT-VZ-177, above, please provide all data, analyses, workpapers, and/or reports upon which Verizon relied in arriving at the assumptions about which information request ATT-VZ-177 inquires, and provide an explanation of how Verizon used the information in these reports in order to calculate these percentages. Please provide all data and calculations in an electronic form in which the data can be manipulated (e.g., Excel spreadsheet).

ATT-VZ-179 Regarding each of the forward-looking adjustment factors listed in Tabs 1, 3, 5 and 7, respectively, of Verizon's Wholesale Non-Recurring Cost Model that are less than 100%, please specify exactly the improvements that Verizon took into account in calculating the factor listed there, and please explain how the factor was calculated. With respect to each such improvement, please indicate the time when Verizon expects to have implemented such improvement.

ATT-VZ-180 Please confirm that a 100% Forward Looking Adjustment Factor means that no improvement to the indicated task in the hot cut process is expected within Verizon's planning period, and indicate the relevant planning period. If a 100% factor means something different, please state what it means.

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By its attorneys,

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